

ROSENBERG & ESTIS, P.C.
ATTORNEYS AT LAW

733 Third Avenue
New York, New York 10017
212.867.6000
Fax 212.551.8484
www.rosenbergestis.com

Matthew S. Blum
+1 (212) 551-8459
mblum@rosenbergestis.com

November 14, 2024

BY E-FILING

The Honorable Robert W. Lehrburger
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 1007-1312

Re: *Tecspec LLC, et al. v. Michael Donnolo, et al.*,
Civil Action No. 1:24-cv-8077-JHR-RWL
Letter response to Plaintiffs' demands for further disclosures

Dear Judge Lehrburger:

This law firm represents Defendants in the above-referenced action. In compliance with Your Honor's docket order of November 12, 2024 (Docket #36) (the "**Order**"), we write to confirm Defendants' fully and completely compliance with the Court's previous orders via Defendants' initial and supplemental disclosures.

In addition to Defendants' initial disclosures, which were attached as "Exhibit A" to Plaintiffs' November 11, 2024 letter (Docket # 35), Defendants sent Mr. Melzer a letter, via email, on November 13, 2024 ("**Defendants' Response Letter**")¹ responding to each of Plaintiffs' categories of requested accounts/logins.

However, Plaintiffs already had control of the Tecspec's Dropbox account and operative email account and, therefore, the means to reset many of the passwords and accounts now sought. Nevertheless, Defendants' Response Letter reminds Plaintiffs that several requested items are stored on servers under their control, stored in the manufacturing and other equipment in Tecspec's sole possession (e.g., #7 CNC machine, #9 assembly line), or can be manually reset via equipment already in Tecspec's exclusive possession (e.g., #4 physical switch on network device).

We respectfully submit that Defendants' response to the Order is timely, that Defendants have fully and completely complied, and that sanctions are not warranted against Defendants. Should the Court require anything further, please do not hesitate to reach out to the undersigned.

Respectfully Submitted,



Matthew S. Blum

Cc: All counsel of record (*via e-filing*)

¹ Given the sensitive nature of the accounts and passwords, a copy of Defendants' Response Letter is not attached but, should the Court require, Defendants would be happy to send it directly to the Court for *in camera* review.